



CERTIFICATE OF MAILING (37 CFR 1.8a)

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to: Mail Stop Appeal Brief - Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450.

Date: August 7, 2003

  
Donald L. Otto

#17  
8-30-03  
Robertson  
Reply  
Brief  
1063

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Attorney Docket CUTLP0101USA

In re PATENT application of

Stephen Cutler et al

Serial No. 09/827,048

Filed April 5, 2001

For: ELECTRICAL CONNECTOR WITH IMPROVED LOCKING MEANS

Confirmation No. 4511

Art Unit 2833

Alexander Gilman, Examiner

**REPLY BRIEF**

Mail Stop Appeal Brief - Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

Sir:

With regard to claims 39 and 44, the Examiner argues on page 3 of the Examiner's Answer that the housing 11 of Tozuka et al and the claimed interdigital lip integral with the contact section that acts as a stop for the second conductor function identically since they both stop the entire end portion of the conductor.

TECHNOLOGY CENTER 2800

AUG 13 2003

RECEIVED

Appellants disagree, in that the claimed inturned lip locates the entire end portion of the conductor within the contact component, whereas the housing 11 of Tozuka et al does not. To the contrary, as stated in the paragraph bridging columns 5 and 6 of Tozuka et al, second electric wire insertion holes 34 are formed in the wall portion 33 of the conductive plate 21 to oppose the electric wire insertion holes 25 of the proximal end portion 26 of the conductive plate so that the peeled electric wire portion 2 extends through the contact element 20 consisting of the conductive plate 21 and leaf-like spring member 22 to have an appropriate electrical contact state within the contact element 20. Therefore, it is respectfully submitted that to eliminate the claimed inturned lip and its function as suggested by the Examiner is clearly improper.

With regard to claims 48 and 49, appellants disagree with the Examiner's contention on pages 2 and 3 of the Examiner's Answer that Gelati discloses a first conductor having a wire terminal connection with the component as recited in claim 49, and that any portion of the electrically conductive component 21 of Tozuka et al can be a first conductor integral with the contact component as recited in claim 48.

With regard to claim 50, the Examiner argues on page 4 of the Examiner's Answer that Tozuka et al, when modified by Gelati, discloses the release hole extending through the elongated rib 29 (Fig. 1). However, it is respectfully submitted there is no suggestion or motivation to provide the release hole of Gelati through the projecting portions 29 of Tozuka et al. As shown in Fig. 1 of Tozuka et al, the projecting portions 29 extend along only a portion of the length

of the long bent piece 27. Thus even if it were proper to provide the Fig. 1 embodiment of Tozuka et al with a release hole as taught by Gelati, which appellants do not admit, one skilled in the art would provide the release hole in the portion of the bent piece 27 before the projecting portions 29, not through the projecting portions 27.

With regard to claims 38 and 42, the Examiner argues on page 4 of the Examiner's Answer that the connecting portion 1A of Kubota et al (Fig. 1) is a curvilinearly configured end portion adapted to grip the uncovered wire of the cable. In support, the Examiner cites column 3, lines 13-14 of Kubota et al which states that the end portion "has a suitable shape in fixing the cable". However, the only shape disclosed in Kubota et al is a "tooth portion to bite the cable" (column 3, lines 13-14), not a grip locking end portion that is transversely curved across the entire width of the grip locking end portion to conform to the profile of the second conductor as recited in these claims.

The Examiner also argues that "to bite" means not just "to cut, or tear", but also means "to grip", citing The American Heritage Dictionary, 4<sup>th</sup> ed. However, as this dictionary definition makes clear, to "bite" means "to cut, grip or tear with or as if with the teeth". Thus the connecting portion 1A of Kubota et al functions quite differently than the claimed grip locking end portion that is transversely curved across its entire width to conform to the profile of the second conductor. Moreover, exception is taken with the Examiner's statement on page 5 of the Examiner's Answer that the specification lacks an adequate explanation as to why the end portion should be transversely curved across its full width. Fig. 14 of

the drawing shows the phantom edge 159 transversely curved across its full width, and page 11, lines 7-9 of the specification states why the edge 159 of the spring arms may be transversely curved as shown in Fig. 14, namely, "to conform to the shape of a wire to be contacted".

### **CONCLUSION**

For the foregoing reasons and the reasons set forth in appellants' supplemental and main appeal briefs, appellants respectfully request that the rejection of claims 33-39, 42, 44 and 48-50 on appeal be reversed and that such claims be allowed.

This reply brief is filed herewith in triplicate.

If any fees are required to be paid in connection with the filing of this reply brief, please charge such fees to our Deposit Account No. 18-0988.

Respectfully submitted,

RENNER, OTTO, BOISSELLE & SKLAR, LLP

By 

Donald L. Otto  
Registration No. 22,125

1621 Euclid Avenue  
Nineteenth Floor  
Cleveland, Ohio 44115-2191  
Phone: 216-621-1113  
Fax: 216-621-6165  
Z:\SEC177\CUTLIP101A\REPLY BRIEF.doc